

## ***BLUESEA PRIVACY POLICY***

BLUESEA is committed to respecting and protecting individuals' privacy rights. ("BLUESEA," "we," "our," or "us") provides this privacy policy to explain what we collect, use, and share information. It is important that you fully understand what happens to the information we gather from you or other user of BLUESEA's website and services. Please read this Privacy Statement carefully to understand how we will use and protect your personal information. This Privacy Policy is subject to any service agreement between BLUESEA and you. By using the Service or this Site, you acknowledge that you have read and understood this Privacy Policy. The Services are not directed to the individual person under 16 years of age and BLUESEA does not intentionally or knowingly collect Personal Information on such users.

### **1. THE SERVICES**

We provide automated web-based advertising services. BLUESEA provides advertisers, advertising agencies, Demand-Side Platforms and advertising networks (collectively, "Demand Partners") and website and/or mobile application/website developers and/or owners publishers (collectively, "Supply Partners"); Supply Partners and Demand Partners

are also referred to as “Customers”) with the following Services: “Ad Exchange service” means that enables Supply Partners to make their ad inventory available for purchase by Demand Partners for their ad campaigns through a Programmatic auction and for the winning ad of such auction to be served on Supply Partner; “Mediation service” means that enables Supply Partners to optimize placement of ads by third-party Demand Partners on their website, mobile application or mobile website (collectively, “Property”) and for Demand Partners to buy ad inventory and serve ads directly on such property; “Programmatic Mediation service” means through Programmatic auction, Supply Partners and Demand Partners can sale and purchase of advertising space inventory on the Property; “Offer Wall service” means a service that make Supply Partners and Demand Partners to use an opt-in scrollable offers which includes individual Ads to integrate into Property. “Direct Sales service” means a service that make Supply Partners and Demand Partners to run ad campaigns on Properties. BLUESEA may provide or update ancillary services or additional services set forth above from time to time. BLUESEA has no direct engagement or interaction with the individuals that visit Customers’ services (users), except for the BLUESEA Offer Wall service where BLUESEA provides technical support to users of the Offer Wall on behalf of Supply Partner. When you contact BLUESEA’s customer support team for technical issues related to the Offer Wall, BLUESEA will process

any Personal Information that you provide within the support request form, such as your name and email address to respond to your support request. BLUESEA requires Customers to provide a privacy policy of their own, as required by the applicable legislation and, if required by applicable legislation, to also provide an adequate notice to Users about this Policy.

## **2. THE PERSONAL INFORMATION THAT BLUESEA COLLECTS AND RECEIVES**

We collect Personal Information from devices, Properties, and partners. AS described in this Privacy Policy, through BLUESEA Services, we may collect Personal Information for providing the Services and for other specific purposes. BLUESEA only collects Personal Information that the Supply Partner had instructed BLUESEA to collect, in writing, prior to such collection, and subject to your permissions inside the Property and/or your mobile device. BLUESEA may change or update tools to collect information from time to time and may amend this privacy policy if the policy will be impacted by a new tool. use a new tool and BLUESEA's use of a new tool impacts BLUESEA's privacy practices, it will amend this Privacy Policy accordingly. When interacting with the Property, BLUESEA may collect/receive the following information, which includes Personal Information: Regarding your device, such as device type and model, browser type, network provider, language. Regarding the Property, such

as package name, version, key words. Regarding your operation system, such as Android, iOS. Regarding your mobile advertising identifiers, such as your Advertising ID (Apple IDFA or Google AAID). Regarding your device provides, such as device IP address, network connection type and device GPS location (only if you provide permission). Regarding Information BLUESEA receives from Supply Partners, such as your age, gender, GPS location, zip code, . Regarding Information BLUESEA receives from Third Parties about you from sources other than the Property, such as non-precise device location based on IP address, device specifications and User's interests.

### **3. WHAT DOES BLUESEA DO WITH PERSONAL INFORMATION?**

We provide, improve ourselves and for other lawful purposes. BLUESEA uses the Personal Information that it collects and receives to provide the Services; to enable and optimize the Services' tools and features; to improve the Services and to continue developing the Services; to maintain the Services; to study and analyze the functionality of the Services, Customers' and Users' activities; to measure the Services' activity for pricing purposes; to provide support; BLUESEA uses the Personal Information to evaluate Users' interests and behavior on a pseudonymous, anonymous basis for delivering tailored content If necessary. BLUESEA uses Personal Information to enforce its terms,

policies and legal agreements, to abide by court orders and warrants, to collect debts, and assist law enforcement agencies, prevent fraud, misappropriation, infringements, identity thefts and any other misuse of the Services, and to take any action in any legal dispute and proceeding. BLUESEA dedicates to process Personal Information only for the purposes specified in this policy. To the extent relevant and within BLUESEA's technological and operational ability, BLUESEA will make efforts to maintain accurate information that is complete and up to date.

#### **4. INFORMATION SHARING**

We share Personal Information about you with Demand and Supply Partners, with data enrichment sources, with our affiliates, with law enforcement and on a merger or an acquisition. BLUESEA shares Personal Information for the following purposes:

- Share it with its Trusted Demand Partners: In order to serve you with contextual ads about the content that you view or use on the Property, or targeted ads which are based on your preferences and online behavior, and that we believe can interest you.
- Helping Demand Partners to know the performance of their ad campaigns and generate related report to improve their ads performance over time.
- Share it with Supply Partners: Helping them better know how Users are engaging with ads, the kind of Users and the kind of ads;
- Share it with BLUESEA's corporate affiliates for providing the better Services.
- Share it with Third Parties: To receive additional data on you

from sources other than the Property for helping research and perfect the Personal Information that we collect about you and serve you with more relevant ads on the Property and on additional online properties. To receive Third Party's services, such as fraud protection, bot detection, rating, analytics, viewability, geo location services, ad security and verification services. Share it with law enforcement and/or government agencies, courts, and/or other organizations: (a) as required by law, such as to comply with a subpoena, or similar legal process; and/or (b) when BLUESEA believes in good faith that disclosure/sharing is necessary to protect its rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; Share or transfer it if BLUESEA is involved in a merger, acquisition, or sale of all or a portion of its assets, as part of such transaction. BLUESEA will provide a prominent notice on the Site of any change in ownership or uses of this Personal Information if applicable. In any event, the entity which will assume the ownership of the Site will continue to protect Personal Information related to you under this Policy; Share it in any other circumstances where BLUESEA receives your written consent.

## **5. AGGREGATED AND ANALYTICAL INFORMATION**

Aggregated data is not identifiable. We use it for legitimate business purposes and may use standard analytical tools. BLUESEA uses standard analytics tools. The privacy practices of these tools are subject to their

own privacy policies, and they use their own cookies to provide their service (for further information about cookies, please see the 'Cookies' section in this policy). BLUESEA uses the standard analytics tools of Google Analytics and also use additional or other analytics tools, from time to time. The privacy practices of these tools are subject to their own privacy policies. See Google Analytics Privacy Policy at: <http://www.google.com/analytics/learn/privacy.html>. Nothing will be impacted on your privacy, since there is no reasonable way to extract data from the aggregated information that can be associated with you. BLUESEA uses anonymous, statistical, or aggregated information and shares it with its partners for lawful commercial purposes. Your Personal Information may only be shared based on the terms of this policy, or subject to your prior consent.

## **6. COOKIES WE USE COOKIES.**

Cookies is a small piece of data sent from a website and stored on the user's device by the user's web browser while the user is browsing.

BLUESEA uses session cookies for lawful purposes. BLUESEA's cookies do not collect any Personal Information about you. Your device removes session cookies when you close your browser session. The cookie can recognize your device based on internal identifier of BLUESEA's systems and in the future when you visit a website, if you return to that website, it can read that cookie to remember you from your last visit. Cookies will be

used by BLUESEA and its Demand Partners Advertisers to deliver ads targeted to you and track your activities with these ads based on the tracking of over time. If you wish to delete cookies or limit the kinds of cookies that can be placed on your device You need to check out the settings in your browser on your device when you want to delete cookies or restrict the type of cookies, use the 'Help' tab or look for settings like 'Options' or 'Privacy.' From there, you can delete cookies, block them or control when they can be placed.

## **7. USER CHOICE**

You can logout your account, opt-out from location-based advertising, restrict the use of tracking data in order to ad targeting, opt-out of our Demand Partners and delete cookies. You can disable your account through your account page if you have an account in the Services, at any time, Thereafter, BLUESEA will stop collecting any Personal Information from you. But, BLUESEA stores and continue using or making available Personal Information that relates to you. You can read the Data Retention section in this policy for further information. You can turn location services off through your device settings, if you wish to opt-out from collection and use of precise location data for advertising. The latest versions of iOS and Android allow you to limit which particular applications can access your location information. You also can limit the use of identifiers for ad targeting on your devices. When you turn on this



setting, apps are not permitted to use the advertising identifier to serve consumers targeted ads. companies may still be able to monitor your app usage for other purposes, although this tool will limit the use of tracking data for targeting ads, such as research and fraud prevention. You may reset the identifiers on your mobile device in the device settings. For Android, the path is Google settings > Ads > Reset advertising ID. iOS users can do this by following Settings > Privacy > Advertising > Reset Advertising Identifier. Following such restart, the device is harder to associate with past activity, but tracking can start anew using the new advertising identifier. If you'd like to opt-out from Demand Partners' use of Personal Information about you to serve targeted advertising to your mobile application, you can download the Digital Advertising Alliance's mobile application for each of your devices and set your preferences in the mobile application. [Download AppChoices for iOS devices](#) [Download AppChoices for Android devices](#) If you reset the mobile advertising identifiers, you will also need to reset your preferences in the AppChoices applications. If you delete all cookies, you'll also delete the cookies that indicate your preference to opt out of targeted ads. Please note that even if you opt out of targeted advertising, a company will still use cookies for other purposes, such as to limit the number of times you're shown a particular ad. Web browsers offer a "Do Not Track" ("DNT") signal. A DNT signal is a HTTP header field indicating your preference for tracking

your activities on the Services or through cross-site user tracking. The Services do not respond to DNT signals.

## **8. YOUR CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, California Civil Code Section 1798.83 permits you to request in writing a list of the categories of Personal Information relating third parties to which BLUESEA has disclosed Personal Information during the preceding year for the third parties' direct marketing purposes. To make such a request, please contact us at: [privacy@BLUESEA.com](mailto:privacy@BLUESEA.com).

## **9. ACCESSING PERSONAL INFORMATION RELATED TO YOU**

You can request access to Personal Information related to you. At any time, you can contact us at: [privacy@BLUESEA.com](mailto:privacy@BLUESEA.com) and request to access the Personal Information that BLUESEA keeps about you. BLUESEA will need to ask you to provide it with credentials to make sure that you are who you claim you are. If you find that the details on your account are not accurate, complete or updated, then please provide us the necessary information to correct it. At any time, you can contact BLUESEA at: [privacy@BLUESEA.com](mailto:privacy@BLUESEA.com) and request to access the Personal Information that BLUESEA keeps about you, and to verify the accuracy of the data. If you'd like us to delete data that you have provided through the Property,

please contact BLUESEA at: [privacy@BLUESEA.com](mailto:privacy@BLUESEA.com) and BLUESEA will respond within a reasonable time after receiving your email. BLUESEA will retain and use Personal Information related to you as necessary to comply with its legal obligations, resolve disputes and enforce BLUESEA's agreements. In addition, after BLUESEA deletes Personal Information related to you, residual copies will take a period of time before they are deleted from BLUESEA's active servers and will remain in BLUESEA's backup systems. This deletion will not change or delete Personal Information which BLUESEA has already shared with third parties, as permitted in this Privacy Policy or any other agreement between you and BLUESEA. BLUESEA will use efforts to redact from the data which it will make available to you, any Personal Information related to others. Your EU Data Subject Rights BLUESEA is dedicated to fulfill data subjects' rights under the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). BLUESEA is dedicated to help its controllers as to data subjects' rights under the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). BLUESEA processes personal data as part of its Services as a data processor and the Supply partners are the data controllers under GDPR. As a data processor, BLUESEA is dedicated to help its data controllers to accomplish data subjects' GDPR rights. You can contact the relevant BLUESEA's controller directly if you have any questions and help under the GDPR.

## 10. DATA RETENTION

We retain Personal Information as needed for legitimate and lawful purposes. Generally practice, BLUESEA stores Personal Information about you for only if you use the Property and for a 30 days thereafter., BLUESEA uses Personal Information about you in these cases for internal reporting, analysis and to provide the Services. BLUESEA saves and uses Personal Information regarding you, for longer period of up to 90 days after you discontinue using the Property, and if BLUESEA needs Personal Information related to you for invoicing, reporting and discrepancy investigation reasons. BLUESEA is required to retain information, including Personal Information, by law. Aggregated data will be retained by BLUESEA for longer periods and through a third-party analytics platform. BLUESEA also uses and store Personal Information about you to prevent fraud. Where BLUESEA suspects that the Property that you have used becomes vulnerable to fraudulent activities, BLUESEA will store and use Personal Information related to you, if needed, up to a year after you discontinue using the Property for fraud detection purpose. BLUESEA will process Personal Information based on the necessary for the purposes for which the Personal Information was provided. BLUESEA will keep the Personal Information about you, only if laws require BLUESEA to delete it, or if BLUESEA accepts your request to delete the Personal Information, comply with to applicable laws, or if BLUESEA decides to remove it at its

discretion. As a Customer, as long as you use the Services, BLUESEA will keep Personal Information about you, unless the law requires to delete it, or if BLUESEA decides to remove it at its discretion.

## **11. TRANSFER OF DATA OUTSIDE YOUR TERRITORY**

We store and process Personal Information in the US, in sites operated and maintained by cloud-based service providers. BLUESEA stores and processes Personal Information in various sites throughout the globe, including in sites operated and maintained by cloud-based service providers. If you are a resident in a jurisdiction where transfer of Personal Information related to you to another jurisdiction requires your consent, then you provide BLUESEA your express and unambiguous consent to such transfer. If you are a resident of the European Economic Area (EEA), BLUESEA keeps your Personal Data on Amazon Web Services (AWS) Cloud in the US on BLUESEA's behalf in accordance with the highest degree of security of AWS. To the extent necessary under EU privacy laws and regulations, BLUESEA will implement data onward transfer instruments, such as the Controller to Processor SCCs, the EU-U.S. and Swiss-U.S. Privacy Shield Framework and a statement of compliance with the Privacy Shield Principles. BLUESEA implements other or additional onward transfer mechanisms, as available from time to time.

## **12. INFORMATION SECURITY**

BLUESEA implements systems, applications and procedures to secure Personal Information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information. BLUESEA commits to safeguarding the confidentiality of Personal Information related to you. BLUESEA and its hosting services implement systems, applications and procedures to secure Personal Information related to you, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information. As an example, BLUESEA limits access to Personal Information to authorized personnel on a need to know basis in order to operate, develop or improve the Services. While all measures provided reflect the current industry standard of security, BLUESEA cannot guarantee that the Services will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

### **13. CHANGES TO THIS PRIVACY POLICY**

BLUESEA will update its Policy from time to time after giving proper notice. From time to time, BLUESEA will update the Policy. If the updates have minor if any consequences, they will take effect 7 days after BLUESEA posts a notice on the Services' website. Substantial changes will be effective 30 days after BLUESEA's notice was initially posted. You can choose not to accept it and terminate your use of the Services until the new policy takes effect. You shall be deemed to accept the new policy if

you continue using the Services after the new policy takes effect. Note that if BLUESEA needs to adapt the policy to legal requirements, the new policy will become effective immediately or as required.

## **14. CONTACT US**

Please contact BLUESEA's Data Protection Officer at:

[privacy@blueseasx.com](mailto:privacy@blueseasx.com) for further information.

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